

Message

From: Joniskan, Rebecca [RJoniska@idem.IN.gov]
Sent: 3/18/2019 2:53:49 PM
To: Mooney, Susan [mooney.susan@epa.gov]
CC: WEBB, COREY [CWEBB@idem.IN.gov]; Thill, Stephen D [SThill@idem.IN.gov]
Subject: CCR - Indiana Energy Association and definition of infiltration
Attachments: rushenbergtimothy03152019.pdf; 20190215144839584.pdf; 20190318103113429.pdf; 20181217203019963.pdf

Good morning, Susan – Just wanted to bring you up to date on CCR closure plan status in Indiana. We shared with you the letters we sent to several utility companies addressing issues with their closure plans (dated December 17, 2018, I've attached one for reference), and, most importantly, issues with compliance with the closure-in-place performance standards at 40 CFR 257.102(d)(1)(i). IDEM received Duke Energy's responses to our December 17, 2018 letters on February 15, 2019, and those responses all contained nearly identical documents from the Legal Department (attached) and a *Supplemental Technical Analysis* (attached.) On March 15, 2019, we received a "white paper" from the Indiana Energy Association on the definition of "infiltration" and how it relates to the CCR regulation.

IDEM is continuing to review revised closure plans submitted in response to our December 17, 2018 letters, however, we wanted to make you aware of the ongoing discussions surrounding these matters. Please contact me if you have any questions or would like to discuss the matter further.

Sincerely,

Becky Joniskan



Rebecca Eifert Joniskan, Chief
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